

EXHIBIT T

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON,)	
)	
Plaintiff,)	
)	
vs.)	NO. 3:17-CV-05806-RJB
)	
THE GEO GROUP, Inc.,)	
)	
Defendant.)	

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF TAYLOR WONHOFF

APPEARANCES:

FOR THE PLAINTIFF:	MS. ANDREA BRENNEKE ASSISTANT ATTORNEY GENERAL 800 Fifth Avenue, Ste. 2000 Olympia, WA 98164
--------------------	---

FOR THE DEFENDANT:	MS. JOAN MELL III Branches Law 1019 Regents Blvd., Suite 204 Fircrest, WA 98466
--------------------	--

MS. ASHLEY E. CALHOUN
AKERMAN, LLP
1900 Sixteenth Stret
Suite 1700
Denver, CO 80202

ALSO PRESENT:	DAVE HANSEN, VIDEOGRAPHER
---------------	---------------------------

Thursday, August 22, 2019
Olympia, Washington

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON,)	
)	
Plaintiff,)	
)	
vs.)	NO. 3:17-CV-05806-RJB
)	
THE GEO GROUP, Inc.,)	
)	
Defendant.)	

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF TAYLOR WONHOFF

APPEARANCES:

FOR THE PLAINTIFF:	MS. ANDREA BRENNEKE ASSISTANT ATTORNEY GENERAL 800 Fifth Avenue, Ste. 2000 Olympia, WA 98164
--------------------	---

FOR THE DEFENDANT:	MS. JOAN MELL III Branches Law 1019 Regents Blvd., Suite 204 Fircrest, WA 98466
--------------------	--

MS. ASHLEY E. CALHOUN AKERMAN, LLP 1900 Sixteenth Stret Suite 1700 Denver, CO 80202

ALSO PRESENT:	DAVE HANSEN, VIDEOGRAPHER
---------------	---------------------------

Thursday, August 22, 2019
Olympia, Washington

STATE OF WASHINGTON vs GEO GROUP
Taylor Wonhoff, 08/22/2019

1	I N D E X			
2	EXAMINATION		PAGE/LINE	
3	MS. MELL		5	4
4				
5				
6				
7				
8				
9				
10	E X H I B I T I N D E X			
11	EXHIBIT NO.	DESCRIPTION	PAGE/LINE	
12	NO. 261	Notice of 30(b)(6) Deposition; 10 pgs.	164	17
13	NO. 262	Document entitled Statement of Interest of the United States; 18 pgs.	90	20
14				
15	NO. 263	Compilation of E-mail; 13 pgs.	92	7
16	NO. 264	Compilation of e-mails; 2 pgs.	106	11
17	NO. 265	Compilation of e-mails; 3 pgs.	123	25
18	NO. 266	Compilation of e-mails; 5 pgs.	133	17
19	NO. 267	Compilation of e-mails; 6 pgs.	136	2
20	NO. 268	Compilation of e-mails; 3 pgs.	137	10
21	NO. 269	Compilation of e-mails; 7 pgs.	139	16
22	NO. 270	Compilation of e-mails; 2 pgs.	140	20
23	NO. 271	Compilation of e-mails; 5 pgs.	144	10
24	NO. 272	Compilation of e-mails; 2 pgs.	145	9
25				

STATE OF WASHINGTON vs GEO GROUP
Taylor Wonhoff, 08/22/2019

1	EXHIBIT NO.	DESCRIPTION	PAGE/LINE
2	NO. 273	Compilation of e-mails; 2 pgs.	145 25
3	NO. 274	Compilation of e-mails; 7 pgs.	147 13
4	NO. 275	Compilation of e-mails; 4 pgs.	149 17
5	NO. 276	Compilation of e-mails; 1 pg.	150 4
6	NO. 277	Final Bill Report, SJR 8212; 2 pgs.	152 5
7			
8	NO. 278	Copy of Washington State Constitution, Section 29, Convict Labor; 1 pg.	154 23
9			
10	NO. 279	Report of Washington Inmate Labor Programs, SJR 8212 (2007); 2 pgs.	158 2
11	NO. 280	Copy of article from Seattle PI entitled P-I Endorsement: Smarter prisoners; 2 pgs.	158 22
12			
13	NO. 281	Copy of Senate Joint Resolution 8212; 3 pgs.	159 12
14			
15	NO. 282	Copy of Class Action Complaint; 20 pgs.	160 2
16	NO. 283	Arguments in support of SJR 8212 in Washington 2007 Voters Guide; 1 pg.	161 22
17			
18			
19			
20			
21			
22			
23			
24			
25			

STATE OF WASHINGTON vs GEO GROUP
Taylor Wonhoff, 08/22/2019

1 BE IT REMEMBERED that on Thursday, August 22,
2 2019, at 10:24 a.m. at 1125 Washington Street SE, Olympia,
3 Washington, before DIXIE J. CATTELL, Certified Court
4 Reporter, appeared TAYLOR WONHOFF, the witness herein;

5 WHEREUPON, the following proceedings were had,
6 to wit:

7
8 (EXHIBIT NO. 261 MARKED)
9

10 THE VIDEOGRAPHER: This is a video-recorded
11 30(b)(6) deposition. Today's date is August 22, 2019. The
12 time is 10:24.

13 My name is Dave Hansen. I'm subcontracted by Sound
14 Vision Video Production, 4821 North 14th Street, Tacoma,
15 Washington, 98406; phone number, (253) 905-4941. The
16 deposition today is being held at 1125 Washington Street in
17 Olympia, Washington. The case is State of Washington
18 versus the GEO Group.

19 Present for the plaintiff is Andrea Brenneke.
20 Present for the defense is Joan Mell. The witness is
21 Taylor Wonhoff.

22 The court reporter, Dixie Cattell, will now swear in
23 the witness.

24 * * *

25 * * *

STATE OF WASHINGTON vs GEO GROUP
Taylor Wonhoff, 08/22/2019

1 TAYLOR WONHOFF, having been first duly sworn,
2 testified as follows:

3 EXAMINATION

4 BY MS. MELL:

5 Q State your name.

6 **A Taylor Wonhoff, W-O-N-H-O-F-F.**

7 Q What's your position?

8 **A I am the Governor's deputy general counsel.**

9 Q How long have you been the Governor's deputy counsel?

10 **A I have been in that role since January of 2014.**

11 Q Who's the Governor?

12 **A Jay Inslee.**

13 Q How long has he been Governor?

14 **A Governor Inslee has been in office since January 16, 2013.**

15 Q What do you do in your position as deputy general counsel
16 for Governor Jay Inslee?

17 **A As a member of the Governor's Office of General Counsel, I**
18 **provide legal advice to the Governor and his staff on a**
19 **range of matters. My portfolio includes clemency, public**
20 **records, administrative appeals, judicial appointments, and**
21 **a range of other matters.**

22 Q Do you sit with him on any executive regular meetings with
23 his appointees, his department appointees?

24 MS. BRENNEKE: Object to the form.

25 **A I do not regularly sit in on executive team meetings or in**

STATE OF WASHINGTON vs GEO GROUP
Taylor Wonhoff, 08/22/2019

1 don't know what the -- I'm trying to make sure I understand
2 how you're answering. Is it because there's been no
3 conversation, or are you recalling an
4 Office-of-the-Governor-type conversation about cost of
5 confinement and how they're covered?

6 MS. BRENNEKE: Object to the form of the
7 question. Beyond the scope of the 30(b)(6) deposition.

8 **A I cannot recall any conversations that relate to**
9 **incarcerated individuals covering the cost of their**
10 **confinement at the detention center, at the Northwest**
11 **Detention Center.**

12 Q (By Ms. Mell) Do you recall any conversations about
13 detained individuals in the state of Washington covering
14 the cost of their confinement?

15 MS. BRENNEKE: Same objection.

16 **A It is my understanding that it's -- that the work that**
17 **individuals in state detention facilities are doing is not**
18 **necessarily to offset the costs of their incarceration, but**
19 **is done for them to build their skills, to rehabilitate,**
20 **to -- to, I don't know, address idleness, give them**
21 **something to do, rather than to cover the costs of their**
22 **incarceration.**

23 Q (By Ms. Mell) Okay. So idleness is an objective to work
24 by detainees?

25 **A Yes.**

STATE OF WASHINGTON vs GEO GROUP
Taylor Wonhoff, 08/22/2019

C E R T I F I C A T E

I, DIXIE J. CATTELL, the undersigned Registered Professional Reporter and Washington Certified Court Reporter, do hereby certify:

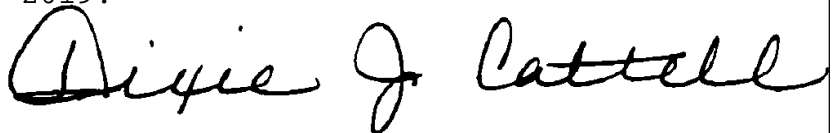
That the foregoing deposition of TAYLOR WONHOFF was taken before me and completed on the 22nd day of August, 2019, and thereafter transcribed by me by means of computer-aided transcription; that the deposition is a full, true and complete transcript of the testimony of said witness;

That the witness, before examination, was, by me, duly sworn to testify the truth, the whole truth, and nothing but the truth, and that the witness reserved signature;

That I am not a relative, employee, attorney or counsel of any party to this action or relative or employee of such attorney or counsel, and I am not financially interested in the said action or the outcome thereof;

That I am herewith securely sealing the deposition of TAYLOR WONHOFF and promptly serving the same upon MS. JOAN MELL.

IN WITNESS HEREOF, I have hereunto set my hand this 26th day of AUGUST, 2019.



Dixie J. Cattell, RPR, CCR
NCRA Registered Professional Reporter
Washington Certified Court Reporter CSR#2346